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*Attorneys for Lead Plaintiffs Alameda County
Employees' Retirement Association,
Government of Guam Retirement Fund, New
Orleans Employees' Retirement System and
Louisiana Sheriffs' Pension and Relief Fund*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE WELLS FARGO MORTGAGE-
BACKED CERTIFICATES
LITIGATION

Civil Action No. 09-cv-01376-SI

CONSOLIDATED CLASS ACTION
ECF

STIPULATION AND [PROPOSED] ORDER
SETTING DATE FOR PLAINTIFFS TO FILE
AMENDED COMPLAINT AND RESCHEDULING
THE CASE MANAGEMENT CONFERENCE

1 WHEREAS, on March 19, 2010, the Court scheduled a Further Case Management Conference
2 for May 14, 2010, at 2:30 p.m.;

3 WHEREAS, on April 22, 2010, the Court issued an Order Granting In Part And Denying In Part
4 Defendants' Motions To Dismiss [Dkt. No. 198] ("Order");

5 WHEREAS, the Order granted the Alameda County Employees' Retirement Association, the
6 Government of Guam Retirement Fund, the New Orleans Employees' Retirement System, and the
7 Louisiana Sheriffs' Pension and Relief Fund ("Lead Plaintiffs") "leave to amend their claims against
8 the Underwriter Defendants and Wells Fargo Defendants" no later than May 7, 2010;

9 WHEREAS, Lead Plaintiffs intend to file an Amended Complaint and request an extension until
10 May 28, 2010, to file their complaint;

11 WHEREAS, the parties have met, conferred and agreed to the date for Lead Plaintiffs to file the
12 Amended Complaint and to a schedule for Defendants to answer or move to dismiss;

13 WHEREAS, in light of the foregoing, the parties further agreed to continue the Further Case
14 Management Conference until June 18, 2010.

15 THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned counsel for the
16 parties herein, that:

17 1. Defendants are not required to respond to the existing Complaint;
18 2. Lead Plaintiffs shall file their Amended Complaint on or before May 28, 2010;
19 3. If any Defendant(s) answer the Amended Complaint, such Defendant(s) shall file the
20 answer(s) on or before July 16, 2010;

21 4. If any Defendant(s) file motion(s) to dismiss the Amended Complaint, the following
22 briefing schedule shall apply:

- 23 a. The Defendant(s) shall file any motion(s) to dismiss no later than June 25, 2010;
24 b. Lead Plaintiffs shall file any opposition(s) no later than July 16, 2010;
25 c. Defendants shall file any reply(ies) no later than August 6, 2010;
26 d. Subject to the Court's availability, the hearing on the motions to dismiss will be
27 set for August 20, 2010, at 9:00 a.m.
28

5. Subject to the Court's availability, the Further Case Management Conference is continued to June 18, 2010, at 2:30 p.m.

Dated: May 4, 2010

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ Timothy A. DeLange

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*Attorneys for Lead Plaintiffs Alameda County Employees'
Retirement Association, Government of Guam Retirement
Fund, New Orleans Employees' Retirement System and
Louisiana Sheriffs' Pension and Relief Fund*

Dated: May 4, 2010

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/s/ David H. Fry

DAVID H. FRY

*Attorneys for the Wells Fargo Defendants and the
Individual Defendants*

1 Dated: May 4, 2010

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7 /s/ Bruce A. Ericson

8 BRUCE A. ERICSON

9 *Attorneys for the Underwriter Defendants*

10 Dated: May 4, 2010

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17 /s/ William G. McGuinness

18 WILLIAM G. MCGUINNESS

19 *Attorneys for the Underwriter Defendants*

24 Filer's Attestation: Pursuant to General Order No. 45, Section X(B), regarding signatures, I attest under
25 penalty of perjury that concurrence in the filing of the document has been obtained from David H. Fry,
26 Bruce A. Ericson and William G. McGuinness.

27 /s/ Timothy A. DeLange

28 TIMOTHY A. DeLANGE

[PROPOSED] ORDER

In accordance with the parties' stipulation, it is hereby ORDERED that:

1. Defendants are not required to respond to the existing Complaint;
2. Lead Plaintiffs shall file their Amended Complaint on or before May 28, 2010;
3. If any Defendant(s) answer the Amended Complaint, such Defendant(s) shall file the answer(s) on or before July 16, 2010;
4. If any Defendant(s) file motion(s) to dismiss the Amended Complaint, the following briefing schedule shall apply:
 - a. The Defendant(s) shall file any motion(s) to dismiss no later than June 25, 2010;
 - b. Lead Plaintiffs shall file any opposition(s) no later than July 16, 2010;
 - c. Defendants shall file any reply(ies) no later than August 6, 2010;
 - d. Subject to the Court's availability, the hearing on the motions to dismiss will be set for August 20, 2010, at 9:00 a.m.
5. The Further Case Management Conference is continued to ~~June 18~~ July 2, 2010, at 2:30 p.m.

IT IS SO ORDERED.

DATED: _____, 2010



THE HONORABLE SUSAN ILLSTON
United States District Court Judge

BERNSTEIN LITOWITZ BERGER
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Retirement Association, Government of Guam Retirement
Fund, New Orleans Employees' Retirement System and
Louisiana Sheriffs' Pension and Relief Fund*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GENERAL RETIREMENT SYSTEM OF THE
CITY OF DETROIT, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

THE WELLS FARGO MORTGAGE
BACKED SECURITIES 2006-AR18 TRUST,
THE WELLS FARGO MORTGAGE
BACKED SECURITIES 2006-17 TRUST,
THE WELLS FARGO MORTGAGE
BACKED SECURITIES 2006-15 TRUST,
et al.,

Defendants.

Case No. 09-CV-1376-SI
(Consolidated with 09-CV-1620)

CONSOLIDATED CLASS ACTION
ECF

DECLARATION OF SERVICE

DECLARATION OF SERVICE

I, the undersigned, declare:

1. That I am and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested in the within action; that my business address is 12481 High Bluff Drive, Suite 300, San Diego, CA 92130.

2. That on May 4, 2010, true and correct copies of the following documents:

- STIPULATION AND [PROPOSED] ORDER SETTING DATE FOR PLAINTIFFS TO FILE AMENDED COMPLAINT AND RESCHEDULING THE CASE MANAGEMENT CONFERENCE; and
- Declaration of Service

were filed with the Court electronically. Those attorneys who are registered with the Electronic Case Filing ("ECF") System may access this filing through the Court's ECF System. Attorneys not registered with the Court's ECF System will be duly and properly served in accordance with the Federal Rules of Civil Procedure and the Court's Local Rules (see attached service list).

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Dated this 4th day of May 2010.


KAYE A. MARTIN

SERVICE LIST

Co-Counsel for Defendants Goldman Sachs & Co., JPMorgan Chase, Inc., as successor-in-interest to Bear, Stearns & Co. Inc., HSBC Securities (USA), Inc., Deutsche Bank Securities, Inc., UBS Securities, LLC, Citigroup Global Markets, Inc., Greenwich Capital Markets, Inc., Barclays Capital, Inc., Banc Of America Securities, LLC, and Bank Of America Corporation as successor-in-interest to Merrill Lynch, Pierce, Fenner & Smith, Inc.

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***NON-ECF REGISTRANTS WILL BE SERVED VIA EMAIL**

5/4/2010